

1 RICHARD J. NELSON (State Bar No. 141658)
2 E-Mail: *rnelson@sideman.com*
3 STEVEN M. KATZ (State Bar No. 164617)
4 E-Mail: *skatz@sideman.com*
5 SIDEMAN & BANCROFT LLP
6 One Embarcadero Center, Eighth Floor
7 San Francisco, California 94111-3629
8 Telephone: (415) 392-1960
9 Facsimile: (415) 392-0827

10 Attorneys for Defendants
11 LAWRENCE R. GOLDFARB
12 and BAYSTAR CAPITAL MANAGEMENT

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE R. GOLDFARB and
BAYSTAR CAPITAL MANAGEMENT,

Defendant.

Case No. 3:11-cr-00099 WHA

STIPULATION AND [PROPOSED]
ORDER MODIFYING BRIEFING
SCHEDULE

1 By Order dated June 25, 2012 (Docket No. 29), the Court set a briefing and hearing
2 schedule for a motion in this case. The parties are presently engaged in plea negotiations and
3 believe that a modification to the briefing schedule will improve the chance of a plea agreement
4 being reached. Accordingly, the parties stipulate and request that the Court modify the briefing
5 schedule so that the deadline to file a motion is modified from July 10 to July 17, 2012, and the
6 deadline to file an opposition is modified from July 31 to August 7, 2012. The deadline to file a
7 reply will remain at August 14, 2012, and the motion hearing will remain at September 4, 2012, if
8 a hearing is necessary. Thus, if the Court approves this proposed new schedule, the only change
9 will be that Defendants will submit their motion, if at all, one week later, but Defendants will have
10 only one week for their Reply, instead of two weeks. The United States will have the same
11 amount of time as currently contemplated to file its Opposition, and the Court will not have to
12 alter the hearing date.

13
14 SO STIPULATED:

15 Dated: July 6, 2012

16 MELINDA HAAG
17 United States Attorney

18 /s/ Richard J. Nelson
19 Richard J. Nelson
20 Attorney for Defendants

/s/ Jonathan Schmidt
21 Jonathan Schmidt
22 Assistant United States Attorney

23 **GOOD CAUSE APPEARING**, and pursuant to the parties' stipulation, the briefing
24 schedule for the motion in this case is modified so the deadline to file the motion is July 17, 2012
25 and the deadline to file an opposition is August 7, 2012.

26 **IT IS SO ORDERED**

27 DATED: July 9, 2012.

28 
William Alsup
UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X (B) regarding signatures, I, Richard J. Nelson, attest that concurrence in the filing of this document has been obtained.

Dated: July 6, 2012

By: /s/Richard J. Nelson
Richard J. Nelson

6441-1\1503118v1

SIDEMAN & BANCROFT LLP
LAW OFFICES
ONE EMBARCADERO CENTER, 8TH FLOOR
SAN FRANCISCO, CALIFORNIA 94111-3629